



November 2, 2021

**VIA ECF**

The Honorable Loretta A. Preska  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

Re: *United States v. Adelekan, et al.*, 19-cr-291-LAP

Dear Judge Preska:

I write on behalf of defendant Curlten Otidubor to seek a modification of the terms of his pretrial release to permit him to travel to and reside in the District of New Jersey. Pretrial Services and the Government do not object to this request.

Mr. Otidubor's lease recently expired, and while he is still residing at his prior residence, he is actively searching for a new residence. He would like to seek housing in New Jersey, given the cheaper prices in that market compared to Brooklyn. Currently, Mr. Otidubor's conditions of pretrial release include the condition that he not travel outside of the Southern and Eastern Districts of New York, except that he is permitted (pursuant to this Court's previous modification, *see* ECF No. 227) to travel to the District of New Jersey for work. If Mr. Otidubor finds housing in New Jersey, he would continue his work as a hairstylist in both New Jersey and Brooklyn. Accordingly, we ask that his conditions of release be modified to permit travel to the District of New Jersey, as well as to the Southern and Eastern Districts of New York.

Accordingly, I respectfully request that Your Honor endorse this letter and thereby permit Mr. Otidubor to travel to the District of New Jersey for the purpose of securing housing and, if he finds appropriate housing, to move to and reside in the District of New Jersey. I am happy to address any questions or concerns from the Court.

**SO ORDERED**

  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

Very truly yours,

/s/ Kristen M. Santillo  
Kristen M. Santillo

CC: AUSAs Rebecca Dell and Daniel Wolf  
Pretrial Services Officer Viosanny Harrison